

**REMARKS**

The Examiner rejected Claims 1 – 45 as obvious in view of Moss, US Patent No. 6,488,093 (Moss). For the reasons given below and in view of the amendments made to the claims, the Applicant respectfully traverses the Examiner's grounds for rejection.

Preliminarily it is useful to compare the Moss intervention system to Applicant's intervention system in terms of function. At Col. 3 lines 35 – 37, Moss states, "the complete intervention system is run and operated 'wet' with no hyperbaric or protective enclosure required." Moss discloses a subsea pressured system where seals are made and broken to allow tools in Moss's carousel to be selected and deployed in the well. This means that the tools are kept at a "wet" or subsea pressure and when the carousel is rotated so that the tool is positioned over the wellbore as shown in Moss's Fig. 4, a seal has to be made to allow the subsea pressure to be coupled to the well pressure. After the tool has been deployed and then retrieved and a new tool is to be inserted, the carousel is rotated so that the tool is then back at subsea pressure.

In contrast, this never happens in Applicant's invention. The tool magazine and all of the tools in the magazine are always at wellbore pressure. The difference is significant. Wellbore pressure can typically be 10,000 psi where subsea pressure is at most a few hundred psi. Applicant's invention provides a much more robust and safe system.

Because in use the magazine housing is permanently coupled to the top of the valve housing, it ensures that the magazine and tools are always at wellbore pressure so that there is no requirement to make or break seals, and the advantage is that there is no need to pressure-test the system. This allows tools to be deployed much faster and because seals are not being made and broken, it also is a safer system.

The Examiner is directed to Applicant's Figure 4, where it will be discerned that the housing has a base portion 56 which terminates in a flange, and that in use (e.g. Fig. 3a) this flange is coupled to the top of the valve housing. As stated on page 18, lines 20 – 22 of Applicant's specification, the base of the magazine housing 52a terminates in a wellbore portion which is coupled to the top of a BOP (blowout preventer) seal unit 58. It will also be understood that the magazine pockets 54 are fixed in relation to the magazine housing 52 (see Figs. 4a – 4c for a good view of this) and that the base portion is permanently coupled in the illustrated system to the top of the BOP barrier seal unit 58.

To patentably distinguish these claims from Moss, Applicant has amended independent Claims 1, 22, 31 and 43 to recite that the magazine pockets be in fixed relation to the magazine housing, and that the magazine housing further have a base portion for connection to a valve housing. These amendments have ample support in the specification and drawings, as above discussed. This structure is not seen in nor suggested by Moss's subsea-pressure system. Moss shows a carousel of tool pockets, a selected one of which is rotated onto the wellbore axis, to then make a seal to the BOP 28 at one end and an injector head 26 at the other. Moss's tool pockets aren't permanently fixed relative to the valve housing 28; the open framework 29 called out by the Examiner as a "magazine housing" doesn't have any base portion for connection to the valve housing 28. Claims 2 – 21, 23 – 30, 32- 42 and 44, dependent on one of the independent Claims 1, 22, 31 or 43, are patentable at least for the dependence on an allowable claim. Many of these dependent claims recite additional structure that is now shown or suggested by Moss.

Claim 45 as amended addresses another patentable aspect of Applicant's invention. As best seen in Applicant's Figure 3b and 5a, the slickline 65 used to couple to and control the selected well tool is routed from a winch housing 64, disposed to be radially offset from the tool axis, through a

first lubricator conduit 66, around a sheave 68, and through a second lubricator conduit 70 which is sized for running a well tool selected from the tool magazine in the magazine housing. As pointed out by Applicant's specification at p. 23, line 15 – p. 24 line 2, the use of two independent lubricator conduits, the first for the passage of the wireline and the second for the passage of a tool string, offers considerable weight saving, substantially reduced environmentally induced loadings and enables the lubricator sections to be made from a conventional design connected by metal-to-metal seal tapered hubs. Moss does not disclose or suggest this. In Moss, a rotatable drum 22, open to subsea pressure, pays out a slickline 21 directly into injector head 26 on the tool axis. There is no separate, off-axis conduit for routing the slickline, as from an off-axis winch, and no sheave for redirecting the slickline into the tool-receiving conduit.

For the foregoing reasons, the claims as amended are patentable in view of Moss and the rest of the prior art. Applicant therefore respectfully solicits an early Notice of Allowance on the claims as amended.

This Reply to Examiner's Action is being submitted with a fee for a one-month extension of time (charged concurrently herewith to Deposit Account No. 503982 of Momkus McCluskey Monroe Marsh & Spyratos, LLC), to extend the period for responding to the instant action to May 10, 2007. Applicant's amendments do not necessitate the payment of additional claim fees. Therefore no other fee is thought to be due in conjunction with this submission. Nonetheless, the Commissioner is hereby authorized to charge Deposit Account No. 503982 of Momkus McCluskey Monroe Marsh & Spyratos, LLC to cover any fee deficiency.

Respectfully submitted,

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